



451444

September 7, 2012

Michelle Kerr, Remedial Project Manager  
U.S. Environmental Protection Agency – Region 5  
Superfund Division (SR-6J)  
77 West Jackson Blvd.  
Chicago, IL 60604-3590

**Re: Section 104 Request for Information to Keystone Recycling, LLC for Chemetco Site  
in Hartford, Madison County, Illinois**

Dear Ms. Kerr:

This firm represents OmniSource Corporation (“**OmniSource**”), a scrap and secondary metals processor and distributor with its headquarters located in Fort Wayne, Indiana. OmniSource operates a retail ferrous and nonferrous scrap collection and processing facility located at 850 S. Keystone Avenue, Indianapolis, Indiana. The purpose of this letter is to respond to a second notice of request for information dated August 31, 2012 which was received at OmniSource’s Keystone Avenue facility addressed to Keystone Recycling, LLC (“**Keystone Recycling**”).

In March of 2006, OmniSource, through a wholly owned subsidiary, purchased, pursuant to an Asset Purchase Agreement dated as of March 13, 2006, certain assets from Keystone Recycling and related entities (collectively the “**Sellers**”). As a part of the aforementioned transaction, OmniSource assumed Keystone Recycling’s lease obligation as tenant for the property located at 850 S. Keystone Avenue in Indianapolis, Indiana. Under the terms of the aforementioned Asset Purchase Agreement, no environmental liabilities of the Sellers other than certain identified on-site soil remediation were assumed by OmniSource or its subsidiary.

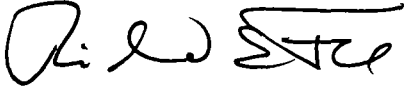
OmniSource is not a successor to Keystone Recycling. There is no commonality of officers, directors or shareholders between Keystone Recycling and OmniSource, some but not all of the same employees may have been hired by OmniSource after the transaction closed but the supervisory personnel were different, the name “Keystone Recycling, LLC” was not retained and OmniSource did not hold itself out as a continuation of the previous enterprise. Accordingly, OmniSource has no liability for any action taken by Keystone Recycling related to the Chemetco Site. Further, no business records relating to the past activities of Keystone Recycling were acquired by OmniSource and, therefore, OmniSource has no access to any information relating to Keystone Recycling’s business or other relationships with the Chemetco Site.

Michelle Kerr, Remedial Project Manager  
September 7, 2012  
Page 2

If you have any questions regarding our client's position as stated above, please feel free to contact the undersigned.

Very truly yours

BARRETT & McNAGNY, LLP

A handwritten signature in black ink, appearing to read "Richard E. Fox", written in a cursive style.

Richard E. Fox